

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

VONEA HUGER; and  
ROSHANDA GERALD, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

SOUTH CAROLINA DEPARTMENT OF  
CORRECTIONS;  
DIRECTOR BRYAN P. STIRLING;  
WARDEN TIM RILEY;  
ASSOCIATE WARDEN ANDREA  
THOMPSON;  
ASSOCIATE WARDEN GARY LANE;  
and JOHN DOES 1-10,

Defendants.

C/A: 3:20-cv-02871-MGL

**PLAINTIFFS' ANSWERS TO  
LOCAL 26.01**

- (A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE: None.**

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE: Plaintiffs are requesting a nonjury trial.**

- (C) State whether the party submitting these responses is a publicly owned company and separately identify:

- (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate;
- (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and
- (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE: Plaintiffs are individuals.**

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01.

**RESPONSE: South Carolina Department of Corrections is headquartered in Columbia, South Carolina, which is in the Columbia Division. Upon information and belief, all of the individual defendants are residents of the Columbia Division. All of the activity relating to the events taking place on August 10, 2017 at Kirkland Correctional Institute occurred in this division.**

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide:

- (1) a short caption and the full case number of the related action;
- (2) an explanation of how the matters are related; and
- (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending.

Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE: No.**

s/Bruce E. Miller

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& ROSHANDA GERALD**, on behalf of  
themselves and all others similarly situated

CHARLESTON, SC  
August 6, 2020